

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

Ross, Sandra R.

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

SAL Acquisition Corp.  
Moran Foods LLC dba Swe-A-Lot Ltd

Vogel, Anna R.

Chagares, Nancy F.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**Complaint for a Civil Case**

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)

**REQUEST FOR TRIAL BY JURY**

Plaintiff requests trial by jury.



Yes



No

BRR

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Saundra Renee Russ  
Street Address 10318 E. 39<sup>th</sup> Terrace  
City and County Kansas City Jackson  
State and Zip Code MO. 64133  
Telephone Number 816-382-5030  
E-mail Address \_\_\_\_\_

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name ANNA R. Vogel  
Job or Title Managing Officer  
(if known)  
Street Address 2900 Ridgeview Drive  
City and County Bel-Nor St Louis County  
State and Zip Code MO. 63121  
Telephone Number 314-226-9603  
E-mail Address ANNA.VOGEL@SAFELDT.COM  
(if known)

**Defendant No. 2**

Name Nancy E. Chagares  
Job or Title Vice President  
(if known)  
Street Address 2309 Xavier Court  
City and County Naperville DuPage County

State and Zip Code

IL 60565

Telephone Number

630-416-3492

E-mail Address  
(if known)

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*



Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

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Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State  
of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) Mona Fido LLC dba Save-A-Lot Ltr, is incorporated under the laws of the State of (name) Missouri, and has its principal place of business in the State of (name) Missouri. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) Missouri.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy \$750,000 Seven hundred fifty thousand

The amount in controversy---the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake---is more than \$75,000, not counting interest and costs of court, because (explain):

\$750,000 10,000 in past medical cost, 200,000 future medical cost, 400,000 Pain & Suffering, 140 Punitive Damages

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you? ON October 6, 2017 I slipped & fell due to crushed grapes and their juices NOT being cleaned up in the produce section of the store.
- What injuries did you suffer? Cervical Spine, Lumbar Spine, and Exacerbated injuries of both knees. Tearing of meniscus, Bump on head
- Who was involved in what happened to you? The Store Manager - Christopher Polito did NOT place a sign warning of the hazard and only started cleaning up after I fell.

- How were the defendants involved in what happened to you? The defendants had NO PROTOCOLS in place directing their employees explicitly when to clean up hazardous spills and to keep customers out of harm's way.
- Where did the events you have described take place? Approximately 50 feet inside The store in the produce Section.
- When did the events you have described take place? At Approximately 7pm on Oct. 6, 2017

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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#### IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

Approx 10,000 Current medical Expenses ; \$200,000 for future Surgeries of both Lumbar back and Neck-Cervical Nerve impingement Surgeries as well as repair of Knees both right and left 400,000 pain & Suffering - I have NO ONE to help take care of me to have Surgeries Now so I suffer 24/7-365 daily since accident \$140,000 punitive damages for retaining a Claims firm Gallagher Bassett who Advised them to hide their Assets, affidavits and lied about me and

denied me good Customer Service by ignoring me altogether

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

10,000 Past Medical 200,000 Future for Surgeries, 400,000 Pain and Suffering  
100 Punitive. They should be punished for deceiving people and NOT  
cleaning their store and insuring the safety of their customers  
I've never been treated as poorly as they've treated me. I've been  
Verbally insulted and just plain ignored as if I don't matter

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Oct. 4, 2019

Signature of Plaintiff

Printed Name of Plaintiff

Saundra R. Ross  
Saundra R. Ross